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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 US RIGHT TO KNOW,) No. 4:22-cv-04359-KAW
14 Plaintiff,)
15 v.)
16 UNITED STATES DEPARTMENT OF)
17 STATE,)
18 Defendant.)
19

20 Plaintiff US Right to Know (“Plaintiff”) and defendant United States Department of State
21 (“Defendant” or “State Department”), by and through their undersigned counsel, respectfully submit this
22 joint status report pursuant to this Court’s Joint Status Report Order dated August 15, 2023, which
23 ordered the parties to file a joint status report by September 1, 2023 and every 180 days thereafter to
24 keep the Court informed of their progress in processing records as set forth in the parties’ stipulation
25 regarding case management and FOIA record production (“Stipulation”), dated January 27, 2023. ECF
No. 24. The parties filed their first joint status report on August 31, 2023. ECF No. 25.

26 As noted in the parties’ first joint status report, prior to the Stipulation, the State Department
27 made two releases of responsive, non-exempt records to Plaintiff. *See* ECF No. 21 at 1–2. The State
28 Department processed records at a rate of 450 pages every 6 weeks in connection with its first release on

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1 October 28, 2022, and at a rate of 500 pages every 6 weeks for its second release on December 9, 2022.

2 *Id.*

3 Pursuant to the Stipulation, the State Department increased its processing rate to 700 pages per
4 month, with releases of responsive, non-exempt records by the end of each month, starting on February
5 28, 2023. *Id.* at 2. Since the date of the Stipulation, the State Department has processed records in
6 accordance with the stipulation and released responsive, non-exempt records to Plaintiff on January 23,
7 March 1, March 31, April 28, May 30, June 30, July 31, August 31, September 29, October 31,
8 November 30, and December 29, 2023, and January 31, 2024. This processing of records remains
9 ongoing, at a rate of 700 pages per month. Accordingly, the parties will respectfully submit their next
10 joint status report to this Court with an update on their progress in 180 days, as ordered, i.e., on or before
11 August 26, 2024.

12 Respectfully submitted,

13 ISMAIL J. RAMSEY
14 United States Attorney

15 Dated: February 27, 2024

16 By: /s/ Savith Iyengar
SAVITH IYENGAR
17 Assistant United States Attorney
Attorneys for Defendant

18 PUBLIC JUSTICE FOUNDATION

19 Dated: February 27, 2024

20 By: **/s/ Daniel C. Snyder
DANIEL C. SNYDER, *pro hac vice*
21 Attorneys for Plaintiff

22 GREENFIRE LAW, PC

23 Dated: February 27, 2024

24 By: **/s/ Lily A. Rivo
LILY A. RIVO
25 Attorneys for Plaintiff

26 ** Pursuant to Civ. L.R. 5-1(h)(3), the filer of the document
27 has obtained approval from these signatories.